

## REMARKS

Reconsideration and allowance of the subject application are respectfully solicited.

Claims 1, 5 through 7, 10, 11, 15 through 17, 20, 33, 35, 37, and 38 are pending, with Claims 1, 10, 11, 20, 33, and 35 being independent.

Claims 1, 10, 11, 20, 33 and 35 have been amended. Support for the amendments to Claims 1, 11, 33, and 35 can be found in the original disclosure at least, for example, at page 25, line 24 through page 26, line 8. Support for the amendments to Claims 10 and 20 can be found at least, for example, in Fig. 18B and the discussion of the fourth embodiment at page 30, line 20 through page 31, line 26. No new matter has been added.

Claims 1, 11, 33 and 35 stand rejected under 35.U.S.C. §103 as being unpatentable over U.S. Patent No. 6,337,882 (Boyer et al.). Applicants traverse this rejection for the reasons discussed below.

Applicants respectfully submit that the basis for this rejection, as set forth in the final Office Action, is flawed both legally and factually. As an initial matter, Applicants submit that the legal standard for determining obviousness has not been properly applied. The Office Action concedes at page 2 that “the cited Boyer reference . . . does not explicitly state that the partial image is exactly twice the size of the display field of view.” Therefore, to conclude that the claimed invention including this feature is obvious as a matter of law, there must be some motivation or suggestion that would have led one skilled in the art to modify the cited reference to obtain this feature. However, the Office Action does not point to any such motivation or suggestion. Instead, the Office Action merely asserts that “the applicant has not disclosed that

having a partial image which is twice the size of the display field of view solves any stated problem or is for any particular purpose.” This is not the legal standard for determining obviousness. It is irrelevant why the claimed invention includes a particular feature, if that feature would not have been obvious to one skilled in the art (i.e., if there is no motivation or suggestion for one skilled in the art to adopt or select that feature). The Office Action improperly attempts to shift the burden to Applicants to show that the claimed feature solves some particular problem. At most, the Office Action seems to say it would have been obvious to try using a partial image that is twice the size of the display field of view, but “obvious to try” is not the correct legal standard.

Moreover, Applicants submit that the Office Action is incorrect as a factual matter, because the above-mentioned claim feature does solve a particular problem, as discussed in the specification at least at page 25, line 24 through page 26, line 8. Specifically, there is a problem in prior art systems that it is sometimes necessary to combine images extracted from multiple partial images to obtain a desired viewpoint position. This increases the processing time and can result in deterioration of the image.

To address the aforementioned problem, the present invention as recited in independent Claim 1 includes, *inter alia*, the features wherein each of a plurality of partial images shares an overlapping portion with adjacent partial images, an angular field of view of the partial image doubles the angular field of the display, and the whole of the partial image is overlapped by adjacent partial images. Independent Claims 11, 33, and 35 recite similar features. By virtue of these features, an image corresponding to a position and a direction of a viewpoint can always be obtained from a single partial image. Accordingly, it is not necessary to combine

images extracted from different partial images and, therefore, the processing time can be shortened and deterioration of the image where partial images are joined can be eliminated.

For the foregoing reasons, Applicants respectfully submit that the present invention recited in independent Claims 1, 11, 33, and 35 is patentable over the art of record.

Claims 5, 10, 15, 20, 37, and 38 stand rejected under Section 103(a) as being unpatentable over Boyer et al. and further in view of U.S. Patent No. 6,661,455 (Toyofuku et al.). Applicants also respectfully traverse this rejection.

Regarding independent Claim 10, the claimed invention recites, among others, the features wherein selected partial images are drawn in a successive memory space, an image corresponding to the position and the direction of a viewpoint is extracted from the memory space where the partial images have been drawn, and each partial image is stored as a 90° rotated image. Independent Claim 20 recites similar features. By virtue of these features, an image can be extracted by simply pointing to the start address and the end address (as shown, for example, in Fig. 18B), and address control when reading image data is simplified so that processing can be performed at high speed.

Applicants submit that the cited art does not disclose or suggest at least the above-mentioned features of Claims 10 and 20. Further, as discussed above with respect to Claims 1, 11, 33, and 35, Applicants submit that the Office Action applies an incorrect legal standard for determining obvious and, in any event, is factually incorrect. Specifically, Applicants refer to the statement at page 3 of the Office Action that “the applicant has not disclosed that rotating the partial images to exactly 90° solves any stated problem or is for any particular purpose.” As discussed above, the correct legal standard for obviousness requires that the PTO point to some

motivation or suggestion that would have led one skilled in the art to modify the cited reference to obtain the claimed feature; it is not legally sufficient to merely say that the Applicants have not explained the purpose of that feature in the claimed invention. An image could be rotated by any amount up to 360°, and the Office Action points to no motivation for the person skilled in the art to modify the cited art to rotate images by 90°.

Further, as discussed above, the combination of claimed features, including drawing partial images in a successive memory space and storing each partial image as a 90° rotated image, provides for simplified address control and increased processing speed, and therefore the claimed features do have a particular purpose.

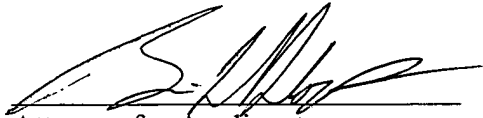
For the reasons discussed above, Applicants submit that the present invention recited in independent Claims 10 and 20 is patentable over the cited art, whether considered individually or in combination.

The dependent claims are believed patentable for at least the same reasons as the independent claims they depend from, as well as for the additional features they recite.

In view of the foregoing, Applicants submit that this application is in condition for allowance. Favorable reconsideration, withdrawal of the outstanding rejections, and a Notice of Allowance are respectfully requested.

Applicants' undersigned attorney may be reached in our Washington, D.C. office by telephone at (202) 530-1010. All correspondence should be directed to our below-listed address.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'B. L. Klock', written over a horizontal line.

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